

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
VICTORIA ANN CLARK	:	
Debtor	:	CASE NO. 1:17-bk-02000
:		
WELLS FARGO BANK, NA, as Trustee,	:	
on behalf of SASCO Mortgage Loan Trust	:	
2007-MLN1 Mortgage Pass-Through	:	
Certificates, Series 2007-MLN1,	:	
Movant	:	
:		
v.	:	
:		
VICTORIA ANN CLARK,	:	
Respondent	:	
:		

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted that Debtor and her husband owned the property; however, Gene Clark, Jr. died on October 29, 2009 and Debtor is now the sole owner of the property.
3. Admitted.
4. Admitted.
5. Admitted on information and belief.
6. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
7. Proof of default is demanded at trial and this paragraph is therefore denied.
8. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

10. Denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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